

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ALICE D. HILL, <i>on behalf of herself and all</i>)	
<i>similarly situated individuals,</i>)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No. 1:12-cv-671-JCC-JFA
)	
)	
CHADWICK, WASHINGTON, MORIARTY,)	
ELMORE & BUNN, P.C.,)	
)	
Defendant.)	
)	
_____)	

MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

Chadwick, Washington, Moriarty, Elmore & Bunn, P.C. (“Chadwick Washington” or “Defendant”), by counsel, submits its Motion to Dismiss Plaintiffs’ Class Action Complaint for Failure to State a Claim Pursuant to Federal Rule of Civil Procedure 12(b)(6). The reasons in support of this motion are more fully set forth in Defendant’s Memorandum in Support, filed contemporaneously herewith and incorporated by reference.

WHEREFORE, Chadwick Washington respectfully requests that this Court dismiss Plaintiff’s Class Action Complaint for Failure to State a Claim with Prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Respectfully submitted,

CHADWICK, WASHINGTON, MORIARTY,
ELMORE & BUNN, P.C.

By: /s/
Joseph R. Pope

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Plaintiff

Alice D. Hill
*on behalf of herself and all similarly
situated individuals*

represented by **Leonard Anthony Bennett**
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